

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

KENDALL RAYE ROGERS,

Plaintiff,

v.

STATE OF DELAWARE,
DEPARTMENT OF PUBLIC SAFETY/
DMV,


Defendants,

C. A. No. 05-721-KAJ

AFFIDAVIT OF JACK E. EANES

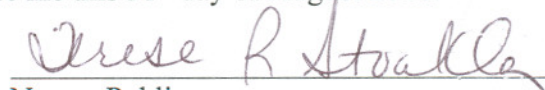
COMES NOW, Jack E. Eanes, who deposes and says:

1. I am employed by the State of Delaware, Department of Transportation, Division of Motor Vehicles (DMV). My title is Chief of Operations. I have been employed in this capacity for over 7 years.
2. As Chief of Operations, I am responsible for the day-to-day operational needs of all DMV facilities statewide. Therefore I am familiar with the circumstances surrounding the transfer of Mr. Kendall Rogers from a position in the DMV Inspection Lanes to the Dover Driver's License Section to the New Castle Driver's License Section and back to the Dover Driver's License Section.
3. I contributed to the responses written in the foregoing Defendant's Response to Plaintiff's Interrogatories Directed to Defendant.
4. My contributions to the responses are true and correct to the best of my knowledge.



Jack E. Eanes

SWORN AND SUBSCRIBED before me this 31st day of August 2006.



Notary Public

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KENDALL RAYE ROGERS,

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C. A. No. 05-721-KAJ

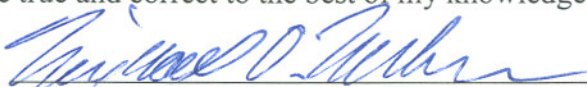
STATE OF DELAWARE,
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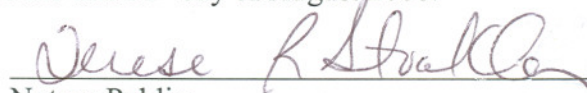
AFFIDAVIT OF MICHAEL O. MCCANN

COMES NOW, MICHAEL O. MCCANN, who deposes and says:

1. I am employed by the state of Delaware, Department of Transportation, Division of Motor Vehicles (DMV). My title is Chief of Administration. I have been employed in this capacity for approximately 10 years.
2. As Chief of Administration, my duties include oversight of personnel matters within the DMV. Therefore I am familiar with the circumstances surrounding the transfer of Mr. Kendall Rogers from a position in the DMV Inspection Lanes to the Dover Driver's License Section, to the New Castle Driver's License Section, and back to the Dover Driver's License Section.
3. I contributed to the responses written in the foregoing Defendant's Response to Plaintiffs' Interrogatories Directed to Defendant.
4. My contributions to the responses are true and correct to the best of my knowledge.


Michael O. McCann

SWORN AND SUBSCRIBED before me this 31st day of August, 2006.


Notary Public